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**FILED**

2015 MAY -8 A 9:57

U.S. MAGISTRATE JUDGE

BY

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN CARLOS RODRIGUEZ,

Defendant.

Case No. 2:15-mj-0394-PAL

CRIMINAL COMPLAINT

VIOLATION:

Title 18, U.S.C. Section 1708, Theft  
or Receipt of Stolen Mail

**BEFORE** the United States Magistrate Judge, Las Vegas, Nevada, the undersigned complainant, being duly sworn, deposes and states:

On or about April 23, 2015, in the State and Federal District of Nevada, JUAN CARLOS RODRIGUEZ, the defendant herein, did unlawfully have in his possession articles and things, to wit: mail addressed to an individual (C.E.P.) who resided at xxx La Suena Ct., Henderson, NV 89012, and various other items of mail which had been contained in the mail and had been stolen, taken, embezzled and abstracted therefrom, knowing the same to have been stolen, taken, embezzled and abstracted, in violation of Title 18, United States Code, Section 1708.

Complainant, as a U.S. Postal Inspector for the United States Postal Inspection Service, states the following as and for probable cause:

1. I am a United States Postal Inspector assigned to the Phoenix Division of the United States Postal Inspection Service (Inspection Service), and have been so employed since April 2012.

1           2.       I graduated from the United States Postal Inspection Service Federal Law  
2 Enforcement Training Academy in 2012 and have received training in investigating violations of  
3 federal laws, including Title 18, United States Code, Section 1708, Section 1704, and Section 1028.

4           3.       I am currently assigned to the External Crimes Team in Las Vegas, NV. The  
5 External Crimes Team investigates postal related crimes including the theft of United States Mail,  
6 United States Postal Service related robberies, burglaries, identity theft, check and credit card fraud.  
7 I have the following education and training: I received a Bachelor's Degree in Criminal Justice from  
8 Indiana University Northwest. I received Federal Law Enforcement Training from the Inspection  
9 Service in the areas of mail fraud, mail theft, identity theft, and credit card fraud from April 9, 2012,  
10 to June 29, 2012. Prior to being a U. S. Postal Inspector, I was a police officer for approximately 14  
11 years and I have been the case agent in charge of specific investigations involving: theft, fraud,  
12 burglary, arson, homicide and credit card fraud. I have interviewed witnesses and conducted suspect  
13 interviews and interrogations and reduced them to written statement form along with presenting  
14 formal criminal charges to the U.S. Attorney's Office for judicial review.

15           4.       Because this affidavit is submitted for the limited purpose of supporting a  
16 criminal complaint, I have not included each and every fact known concerning this investigation. I  
17 have set forth only the facts believed necessary to establish probable cause that John Douglas  
18 Gibson has committed a violation of Title 18, United States Code, Section 1708. This affidavit is in  
19 support of a criminal complaint filed against Juan Carlos Rodriguez.

20           5.       The Inspection Service is currently conducting an investigation of extensive  
21 mail theft in the Henderson, NV area. Many items stolen from the U.S. Mail are checks, credit  
22 cards, bank statements, financial information, and personal identifying information. Personal checks  
23 and credit cards taken from these mailboxes are frequently fraudulently used. Personal and business  
24 checks are often chemically "washed" to remove the handwritten or typed ink so the checks can be

1 made payable to a different payee in different amounts. Financial information stolen from the U.S.  
2 Mail is commonly used to create counterfeit checks using commercially available computer  
3 software. Personal identifying information is frequently used to assume the identity of victims  
4 whose mail was stolen, then used to open banking or credit accounts or fraudulently used to  
5 fraudulently add authorized users to existing accounts.

6           6.       Recent reports from the United States Postal Service reflect several incidents  
7 of mail theft in Henderson and North Las Vegas, NV. In those reports, Postal Service management  
8 indicated that the entire contents of the mailboxes have been removed and the Postal Service cluster  
9 mailbox and/or Neighborhood Delivery and Collection Box Units (NDCBU) found completely  
10 empty by the Postal Service letter carrier. Also, the reports indicate there is no evidence of prying or  
11 other damage to the mailboxes. This information indicates the use of a counterfeit mailbox key to  
12 access the cluster mailboxes in the area on several occasions. Official Postal Service locks and keys  
13 consist of a standard key and lock combination and are used in business and residential NDCBUs. A  
14 single Postal Service key may be assigned to several hundred NDCBUs in multiple zip codes, which  
15 allows Postal Service mail carriers to access an entire range of addresses with one key.

16           7.       On April 7, 2015, the Inspection Service received a report from Seven Hills  
17 Post Office that all of the mail was removed from a cluster mailbox located near 694 Kentons Run  
18 Ave, Henderson, NV 89052. I discovered that surveillance cameras were mounted on the exterior of  
19 a residence, located at 694 Kentons Run Ave, Henderson, NV 89052, and pointed near the reported  
20 cluster mailbox. I contacted Postal Service customer S.T. and obtained a copy of surveillance video  
21 for April 7, 2015. I reviewed the surveillance video which revealed an unknown Sport Utility  
22 Vehicle (SUV) drive by S.T.'s residence during the night with the headlights on. Seconds later, the  
23 driver of the SUV turned off the headlights and parked the vehicle near the curb. After the SUV  
24 parked, multiple individuals exited the SUV. The lights on the SUV remained off until the

1 individuals re-entered the vehicle. The cluster mailbox was not in the view of the camera. The  
2 individuals returned to the SUV minutes later and left the area.

3           8.       On April 8, 2015, I received an anonymous tip via Crime Stoppers that John  
4 Gibson was bragging about stealing mail throughout the Seven Hills area every night. The  
5 anonymous person also said that Gibson mentioned robbing a lady who lives on Misty Moon in  
6 Henderson, NV. The anonymous person said Gibson drives a 4-door SUV with Nevada handicap  
7 license plates that is registered to his father Greg Douglas.

8           9.       The anonymous person said Gibson mentioned producing a Postal Service  
9 mailbox key that successfully unlocks mailboxes in the Seven Hills area. The anonymous person  
10 said that they observed Gibson pulling bags of mail from his SUV. The anonymous person said  
11 Gibson uses methamphetamine. I completed a criminal history check on John D. Gibson. Gibson  
12 has prior felony convictions for Robbery (1992) and Forgery (2007). Gibson has been arrested for  
13 Possessing a Financial Forgery Laboratory, Burglary, Fraudulent Use of a Credit Card, and  
14 Battery/Domestic Violence.

15           10.     On April 9, 2015, I discovered there was a gate camera and license plate  
16 reader located at the entrance of 3059 Misty Moon Ave, Henderson, NV 89052. A mailbox located  
17 near 3059 Misty Moon Ave, Henderson, NV 89052, was reported empty on March 5, 2015. I  
18 obtained the surveillance video of the vehicles entering the gated community on March 5, 2015.

19       I observed an unknown vehicle bearing Nevada handicap plate numbers B5615 enter the gated  
20 community at 04:45 hrs. A Department of Motor Vehicle check revealed the registered owners of  
21 the Mercury Mariner are Dao and Gregory Gibson, believed to be the parents of John Gibson. Dao  
22 and Gregory reside at 6420 E Tropicana Ave Unit 247, Las Vegas, NV 89122.

1           11.     On April 14, 2015, Postal Inspectors conducted surveillance at 6420 E  
2 Tropicana Ave Unit 247, Las Vegas, NV 89122. I observed John Gibson leave this residence and  
3 enter a light colored 2006 Mercury Mariner with NV handicap license plate number B 5615 which  
4 Gibson then drove from the area. Inspectors followed John Gibson to 2816 Rungsted St, Las Vegas,  
5 NV 89142, where Gibson and another unknown male exited his vehicle and entered the residence.

6           12.     On April 22, 2015, I obtained federal tracker warrant number 15-mj-361-NJK  
7 for the 2006 Mercury Mariner with NV handicap license plate number B 5615. Inspectors continued  
8 conducting surveillance of the Mercury Mariner.

9           13.     On April 23, 2015, I conducted surveillance at John Gibson's residence. I  
10 observed a Mercury Mariner with Nevada license plate B 5615 parked in the driveway. I observed  
11 John Gibson exit his residence and drive away in the Mercury Mariner. During the surveillance,  
12 John Gibson picked up an unknown male passenger. I followed John Gibson to the Lowe's  
13 Hardware Store located at 2465 N Nellis Blvd., Las Vegas, NV 89115.

14           14.     I observed John Gibson and the passenger enter Lowe's. The GPS tracking  
15 device was applied to the Mercury Mariner. Approximately 30 minutes later, John Gibson and the  
16 passenger exited Lowe's with items in a shopping cart. John Gibson and the passenger left the  
17 parking lot in the Mercury Mariner. I contacted Lowe's Assistant Manager K. N. and obtained a  
18 copy of John Gibson's transaction. Information provided by Lowe's indicates John Gibson  
19 conducted the transaction using a Lowe's credit card issued in the name of C.E.P. I obtained  
20 surveillance video from Lowe's of Gibson conducting a transaction using C.E.P's Lowe's credit  
21 card. On May 7, 2015, I reviewed the surveillance video provided by Lowe's hardware store and  
22 confirmed that the passenger accompanying John Gibson to Lowe's was Juan Carlos Rodriguez.  
23  
24

1           15.     On April 29, 2015, I made contact with C.E.P and she said she recently  
2 requested a Lowe's credit card, but had not received it in the mail. C.E.P. said she did not give  
3 anyone permission to use her credit card. C.E.P. said her mail is delivered to a cluster mailbox that  
4 is secured with a mailbox key. There were no signs of forced entry to C.E.P.'s mailbox.

5           16.     On April 29, 2015, the Postal Service reported that the contents were removed  
6 from a cluster mailbox located at 2098 Pepperell Ave, Henderson, NV 89044. I checked the  
7 location of the GPS tracking device on April 29, 2015. The GPS tracking device was recorded at  
8 2054 Pepperell Ave, Henderson, NV 89044, at 02:56 hrs. I reviewed the Postal Service mail theft  
9 reports which concluded that the GPS tracking device was in the immediate area of reported mail  
10 thefts from April 23, 2015, to May 4, 2015.

11           17.     On April 30, 2015, I obtained garbage collected from 2816 Rungsted St., Las  
12 Vegas, NV 89142, a residence Gibson was observed entering on April 14, 2015. I reviewed the  
13 garbage and recovered a vehicle registration document which appeared to be from The Department  
14 of Motor Vehicle addressed to A.J.K., 375 Conestoga Way Unit 2922, Henderson, NV 89002.  
15 Several other rifled mail pieces were found, however the contents were removed.

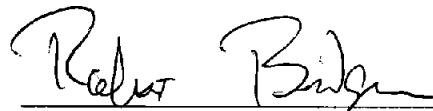
16           18.     On May 4, 2015, I obtained garbage collected from 6420 E. Tropicana Ave  
17 Unit 247, Las Vegas, NV 89122, a mobile home Gibson was observed leaving on April 14, 2015. I  
18 reviewed the garbage and recovered a letter from CenturyLink to W.C., 2075 Pepperell Ave,  
19 Henderson, NV 89044. Several other rifled mail pieces were found, however the contents were  
20 removed.

21           19.     On May 6, 2015, at approximately 07:00hrs federal search warrant number  
22 2:15-mj-0389-PAL was signed by Judge Peggy Leen. On May 7, 2015, the aforementioned search  
23 warrant was executed at 2816 Rungsted St, Las Vegas, NV 89142. Upon entry, Inspectors found  
24 Juan Carlos Rodriguez inside a bedroom located on the second level of the residence. Rodriguez

1 was taken into custody and a search of the room was conducted by Inspectors. Multiple checks and  
2 mail in names other than Rodriguez, were located in the room where Rodriguez was contacted.

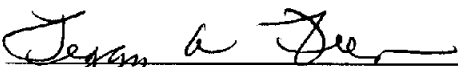
3 20. I interviewed Rodriguez after informing Rodriguez of the Miranda Warning.  
4 Rodriguez said his bedroom is located on the second level of 2816 Rungsted St., Las Vegas, NV  
5 89142. Rodriguez confessed to using a Postal Service mailbox key to successfully steal mail from  
6 secured mailboxes in Henderson, NV. Rodriguez said he engineered a mailbox key to access several  
7 mailboxes throughout Henderson, NV. Rodriguez said he and his friend "Johnny" stole mail  
8 overnight from mailboxes in the Seven Hills and Anthem area of Henderson, NV. Rodriguez said  
9 "Johnny" lives in a mobile home community on Tropicana and "Johnny" drives a Mercury SUV.

10 19. Based on the information contained in the Affidavit, I believe probable cause  
11 exists to establish that in the District of Nevada, JUAN CARLOS RODRIGUEZ did knowingly  
12 possess mail belonging to C.E.P, in violation of Title 18 United States Code Sections 1708.

13  
14 

15 Robert Bridgeman  
16 U.S. Postal Inspector

17 SUBSCRIBED and SWORN to before me  
18 this 8th day of May, 2015.

19  
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21 UNITED STATES MAGISTRATE JUDGE  
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